

# Potomac LAW GROUP

Potomac Law Group, PLLC

1717 Pennsylvania Avenue N.W., Suite 1025 | Washington, D.C. 20006  
T 202.558.5557 | F 202.318.7707 | [www.potomaclaw.com](http://www.potomaclaw.com)

Jonathan Rosen  
Tel: (202) 321-3416  
[jrosen@potomaclaw.com](mailto:jrosen@potomaclaw.com)

March 3, 2025

## VIA ECF

Chambers of the Honorable Jesse M. Furman  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007  
[Furman\\_NYSDChambers@nysd.uscourts.gov](mailto:Furman_NYSDChambers@nysd.uscourts.gov)

Re: United States v. Frank Filimaua, 1:22CR261-001 (JMF);  
1:S3 22CR261-001 (JMF)

Sentencing Hearing Date: May 25, 2025

The Honorable Jesse M. Furman

On behalf of defendant Frank Filimaua and pursuant to the Court's Individual Rules and Practices in Criminal Cases ("Rules"), undersigned counsel is writing this unopposed letter-motion seeking leave to file a sentencing memorandum in excess of twenty-five pages. (See Rules at §9B). Consistent with the Procedures for Filing Documents with Redactions (see *id.* at ¶6C), counsel respectfully submits that the instant redactions comply with the E-Government Act of 2002 and the Southern District's ECF Privacy Policy. (See *id.* at 10(A).)

Counsel is mindful of the Court's admonition that the "quality of sentencing letters usually matters more than quantity." (*Id.* at ¶9C). Nevertheless, as presently edited, the defendant's sentencing memorandum is twenty-nine pages (exclusive of the Table of Contents).

In substantial part, the bases for the length of the defendant's prospective filing include an analysis of: (1) [REDACTED]

[REDACTED] (2) Mr. Filimaua's acceptance of responsibility [REDACTED]

March 3, 2025  
Page Two  
Letter Motion to Chambers

[REDACTED] : (3) [REDACTED]  
[REDACTED] : and (4) [REDACTED]  
[REDACTED]

On March 3, 2025, counsel contacted Assistant United States Attorney Danielle Kudlo, who stated that the government has no objection to the instant letter-motion.

As a result, counsel respectfully requests leave to submit a sentencing memorandum on Mr. Filimaua's behalf which exceeds the Court's twenty-five-page limitations.

Respectfully Submitted,

POTOMAC LAW GROUP

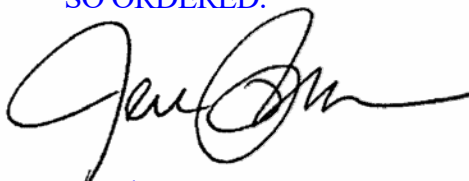


Jonathan Rosen

cc: AUSA Danielle M. Kudlo

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 27.

SO ORDERED.



March 4, 2025